

EASTERN DISTRICT OF NEW YORK

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ISHWARDAT RAGHUNATH

Plaintiff,

-against-

**RESUBMISSION
LETTER FOR EXTENSION
AMENDED
COMPLAINT**

23 CV - 4622 (HG) (LB)

STATE OF NEW YORK, et al.,

Defendants.

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Plaintiff, Ishwardat Raghunath plead to this honorable court of justice for continuance, extension or waiver of time standards provided by law to complete the amended complaint. I am presently working very hard, day by day to reduce the 174 pages of the complaint filed. But I am still trying to keep the most important claims in the complaint.

On a showing of good cause, I kindly ask this court to grant me an extension or continuance to be made at any time during the proceedings due to I a filing as a pro se, a party to the action not well versed with the law. I would like to ask this court for three weeks for this purpose.

I understand that the complain will replace the original complaint filed. The events in my case started from 1999 to the present, an on going event consist of many defendants, hearings and appointments. The extension of time will allow me to focus clearly on the events throughout the case and it will help me to think more reasonably and write the complaint effectively and efficiently. The additional time will help me to correct the errors and shorten the complaint and reduce the amount of defendants.

I will have the ability to plead enough facts to state a claim on the defendants misconduct and to file a clear and concise complaint according to the rules of the court.

Several reasons causing such delays is my medical condition. I am presently suffering from disability and lungs problems, high blood pressure, low cholesterol, kidney issues, sleep apnea, lack of sleep and over weight. I suffer a series of hardship throughout the years, loss of my 4 children, covid victim, loss of employment and my ability to perform normally.

I will be seeking assistance from the federal pro se legal assistance project.

Plaintiff respectfully ask this honorable court to grant him an extension of time to complete the amended complaint.

Award Plaintiff the amended complaint of bringing this action, as well as such other and additional relief as the Court may determine to be just and proper.

Respectfully Submitted,

Date: 8/10/2023



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